

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA, ex rel.
SARAH BEHNKE,

Plaintiffs,

v.

CVS CAREMARK CORP., CVS CAREMARK
Rx, LLC (f/k/a CAREMARK Rx, INC.),
CAREMARKPCS HEALTH LLC, and
SILVERSCRIPT INSURANCE COMPANY,

Defendants.

No. 14-cv-0824 (MSG)

ORDER

AND NOW, this _____ day of _____, 2018, upon consideration of Aetna Inc.'s ("Aetna") Motion for Protective Order Requiring the Return and Protection of Attorney-Client Privileged and Confidential and Proprietary Documents and Information, and Redaction of Portions of the Complaint Containing Information Taken from These Documents and any response thereto, it is hereby **ORDERED** as follows:

- (1) Plaintiff and her counsel shall return and deliver to counsel for Aetna all records taken by Plaintiff from and through her employment with Aetna, and destroy any and all copies thereof;
- (2) Plaintiff and her counsel shall, by Declaration and under penalties of perjury:
 - (a) state and certify that all such records in their possession have been returned, and that any and all copies (electronic or otherwise) have been destroyed; and

(b) provide and certify an accounting identifying each person to whom Plaintiff or her counsel has provided, or who has otherwise accessed, Aetna's records and information from Behnke or Plaintiff's counsel and stating the approximate dates such persons were provided the records and information;

(3) Plaintiff and her counsel shall refrain from using Aetna's privileged and confidential records; and

(4) Plaintiff and her counsel shall redact the following paragraphs of the Complaint, each of which specifically derives from Aetna's privileged materials: ¶¶ 86, 96, 97, 98, 102, 104, 108, 109, 110, 115, 116.

IT IS SO ORDERED.

BY THE COURT:

Mitchell S. Goldberg
United States District Judge